

August 15, 2013

By electronic filing:

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: In the Matter of Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51, and Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech, CG Docket No. 03-123

Dear Madam Secretary:

While we have been using VRS everyday where our lives exceptionally depend on it, we generally agree with the tone and the spirit of FCC's proposed VRS Reform rules with minor exceptions and clarification requests as follows below:

Current and Future Stand-Alone Video Phone:

If we understand the intent of proposed FCC's VRS Reform Rules in regards to the current stand-alone video phone, they may continue as long as they meet the neutral video communication service's standard requirements in order to achieve interoperability. While we certainly support the interoperability concept but the proposed rules beg a few more questions about current and future standard stand-alone video phone being required by the neutral video communication service as follows below:

- Since VRS providers as we understand from the proposed rules will strictly provide service ONLY where VRS consumers would be entirely responsible for their stand-alone-video phones that were previously loaned and/or purchased from VRS providers. If this were the case, where do VRS consumers call to receive technical support/consumer service assistance to deal with stand-alone video phone problems?
- In terms of providing feedbacks on ways to improve functional equivalent either or both – service and/or video phone per se, where do VRS consumers provide their input to? New R&D Entity or Outreach Program being created by FCC?
- The follow up question, as the "R&D" entity/"Outreach Program" prepares to create new functional equivalent features, what criteria does "R&D" entity/"Outreach Program" evaluate and determine to include a new feature in all eligible video phones? In addition, how would the "R&D" entity/"Outreach Program" coordinate the new feature with all VRS providers involved and all VRS consumers' video phone to be deployed?

Speed of Answer (ASA):

As the current proposed rules have indicated that it would reduce from 180 seconds to 30 seconds within 85% of all incoming calls, we are glad the functional equivalent for consumer would be in a position to receive much better quality of service. However, as we know that the Video Interpreter's working conditions to perform the Video Relay Calls is tough and stressful.

The Communications Workers of America's (CWA) comments dated July 22, 2013 in responding to VRS Reform has echoed our concerns, too on video interpreters' working conditions. The attempt to reduce to 30 seconds ASA, may back fire the quality of VRS due to high turnovers and poor performance level. Based on CWA's comments, we have problem now and expect to become worse with faster ASA. We could not simply ignore the root of the problem and move on to faster ASA. FCC needs to review and come up with a plan including study and/or comments with an attempt to find ways to improve the video interpreter's working condition FIRST before to move to faster ASA.

Hotline Calls (one of few examples) vs. 911 Calls

While the FCC now requires VRS and IP Relay providers regular ten-digits to their subscribers so the subscriber's emergency calls along with the ten-digit and location information, automatically route to the appropriate PSAP. From what I understood that their emergency call to VRS provider would be placed first one in the line queue over other general incoming call to address their emergency call.

What about other emergency service such as home security system in the event that home may have break-in burglary, fire or even excessive carbon monoxide where home security personnel needs to contact their VRS consumer to get confirmation before they call out proper authority such as police, fire fighters or medic staff. Long delay to get message from VRS consumer to home security personnel may cause problematic.

Here is one of few good examples - Domestic needs immediate VRS responses. Those calls must respond immediately with VRS. Even the ASA would become quicker with 30 seconds within 85% of all incoming call, the chance that some of those calls may be on hold for a period of time, depending on the call traffic. We would suggest that the FCC reconsiders a plan of action to identify the type of non-911 emergency calls such as Hotlines & Home Security System and coordinate with VRS providers to in order to place them at top of queue to respond those non-911 emergency calls immediately.

We are looking forward to receiving clarification to our questions and action to address our concerns.

Jack R. Cassell & John Dyreson, VRS Users from Madison, Wisconsin